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January 23, 2004

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Re: Our Docket No. : P-0418
 Applicants : J. Scott Perry, Wallace C. Turbeville
 and Paul Hamilton
 Serial No. : New Patent Application
 Filed : Concurrently Herewith
 Title : PAIRED BASIS SWAP RISK AND CREDIT MITIGATION
 SYSTEM AND COLLATERAL MINIMIZATION SYSTEM

Sir:

Kindly file the annexed papers indicated below:

(X) Patent Application
 () Priority Claimed under 35 U.S.C. §119:
 () Amendment adding claims requiring additional statutory fee
 () Declaration claiming small entity status
 (X) Drawings - 9 Sheets
 () Other: Powers of Attorney

Small Entity: () Yes (X) No

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Date of Deposit

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Signature

Respectfully submitted,

AUFRICHTIG STEIN & AUFRICHTIG, P.C.

By:

 Peter D. Aufrichtig, Reg. No.: 31,221
 Attorney for Applicant.

Estimated Fee \$ 0

APPLICATION OF
J. SCOTT PERRY
WALLACE C. TURBEVILLE
and
PAUL HAMILTON

FOR LETTERS PATENT IN THE UNITED STATES

FOR IMPROVEMENTS IN A

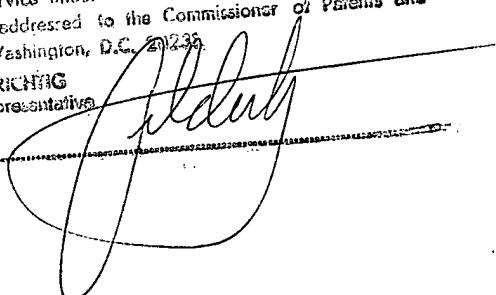
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